Gas IMP Inspection: Pre-Inspection Meeting/Conference Call Agenda

The following areas should be discussed during the pre-inspection meeting or conference call.

Data Gathering

1. PHMSA inspectors will request basic operator information and background, such as:
    a. System maps, system mileage, states traversed
    b. Scope of the operator's IMP – Companies and operator IDs
    c. Also clarify those company assets that are not within the scope of the operator's IMP but are within the scope of another operator's IMP
    d. Recent asset purchases or sales, abandonments, transfers of operational control
    e. Status of mapping data submissions
2. Any recent near-miss or accident events that may influence the Operator's IM plans or the upcoming inspection should be discussed
3. The "Program Info" form (spreadsheet) will be provided to the operator. The operator should complete the spreadsheet and return it to PHMSA's lead inspector prior to the inspection. The IMP Program Data Spreadsheet can be found on the PHMSA web sight at: http://primis.phmsa.dot.gov/gasimp/ProgramInfo.htm
4. PHMSA inspectors will review the Semi-Annual Performance Measures submitted by the operator in the past year. The operator should discuss its confidence in the validity of the submitted data – does the data appropriately reflect pipeline abandonments, new construction, acquisitions, and asset sales that may have occurred during the reporting period? Is the mileage inspected consistent with inspections completed? Does the HCA mileage reflect asset changes and / or data included in IMP documentation or the operator's GIS? Documentation of reported repairs, leaks, failures, and incidents should be available for review during the inspection. Any discrepancies should be corrected by submittal of a corrected Semi-Annual Performance Measures Report.
5. The use of IMP inspection protocols and availability of protocols on public IIM website should be discussed (http://primis.phmsa.dot.gov/gasimp/documents.htm)
6. Any proprietary data issues of concern to the operator and preparation of a pre-inspection "data package" for inspectors should be discussed
7. Access and logistics for inspector's access and retention of electronic and/or hardcopy documentation during the inspection should be discussed
8. Retention of documentation for evidence collection during the inspection should be discussed.
9. The make-up of the inspection team should be discussed including affected interstate and intrastate agents that may be invited to participate on the inspection
10. The operator should provide copies (electronic preferred) to PHMSA inspectors of its IM program and any relevant and referenced procedures that can be reviewed before the inspection.
11. If available, the operator should provide PHMSA inspectors a cross reference that correlates inspection protocols to IM program sections and procedures. If one is not available at the time of the pre-inspection, one should be assembled in time for the inspection.

Inspection Sequence – the operator and PHMSA inspectors should discuss the following topics:

1. The use of projector to view IM program documents; or else the availability of hard copies for each inspection team member
2. The need for the operator to provide an introductory overview of the operator's IMP and discussion of the operator's pipeline system on first afternoon (Monday)

3. The Week 1 schedule – Protocols A (HCA), C (Risk Analysis), B (BAP) (and D – Direct Assessment, if time permits)
4. The Week 2 schedule – Protocols D, G (CDA, if applicable), E (Assessment Results Review), I-N (Performance Measures, Recordkeeping, MOC, QA, Communications Plans, Submittal of Documents), F (Continual Evaluation and Assessment), H (Preventive and Mitigative)
5. The need for inspectors to conduct caucus sessions after completion of each protocol and/or at end of each day
6. The possible use of sub-teams, if necessary. If sub-teams are utilized, determine if the operator's staff is sufficient to support two or more simultaneous discussions. (Some smaller operators may not have enough IM staff to support more than one discussion.)
7. The use of an exit interview at the end of each week's inspection to discuss possible compliance and re-inspection issues
8. The operator's opportunity to present revised program documentation during the second week in order to resolve potential issues discussed during the first week
9. The use of an exit interview at end of second week – the purpose of which is not to discuss first week's issues

HCA Identification – the operator and PHMSA inspectors should discuss the following topics:

1. The information provided to NPMS to assure that pipelines containing HCAs have been submitted. [Note: Pipeline operators are not required to submit information designating the location of HCAs to the NPMS. Only the pipeline centerlines and certain pipeline data must be submitted to the NPMS.]
2. Assets of the operator managed by other entities (other operators, LLC, etc) that are not identified in the operator's IMP
3. HCA identification process documentation and process management systems – for example, what percentage of pipeline used Method 1 versus Method 2
4. Any issues that the PHMSA team should be made aware of prior to the inspection

Risk Analysis– the operator and PHMSA inspectors should discuss the following topics:

1. Process documentation and process management systems
2. An overview of the risk analysis approach (e.g., what model)
3. Any unique or widespread threats (risks) associated with pipeline systems
4. Any issues that the PHMSA team should be made aware of prior to the inspection

Baseline Assessment Plan– the operator and PHMSA inspectors should discuss the following topics:

1. An overview of Baseline Assessment Plan (BAP) – how many BAPs, what assessment methods are used
2. If unique threats are associated with pipeline systems, the relevant assessment methods
3. Tabulation of integrity assessment mileage (total and percentage complete) across company divisions and pipeline systems
4. The possibility (or notification to PHMSA) of applying "other technology" during initial assessment phase
5. The degree to which direct assessment will be used (help determine the time required for protocol D)
6. What percentage of the mileage will take credit for prior assessments
7. The need for PHMSA inspectors to select pipelines for inspection of records of in-line inspections, hydro tests, direct assessment, IMP repairs, and corrosion records
8. BAP process documentation and process management systems

Direct Assessment and CDA– the operator and PHMSA inspectors should discuss the following

topics:

1. The degree to which the operator will use direct assessment on its system.
2. The operator's prior history (and success or failure) of using this assessment method
3. Process documentation and process management systems
4. Any issues that the PHMSA team should be made aware of prior to the inspection

Review of Assessment Results and Remedial Action – the operator and PHMSA inspectors should discuss the following topics:

1. The PHMSA team's need to review assessment findings and the need for clear documentation in this area including ILI reports, dig lists, excavation reports, pressure test results, etc. Documents need to have clear dates of discovery, excavation, pressure reduction, and repair.
2. Any official notification(s) to PHMSA regarding inability to meet the IM repair timetables
3. Process documentation and process management systems
4. Any issues that the PHMSA team should be made aware of prior to the inspection

Performance Measures – the operator and PHMSA inspectors should discuss the following topics:

1. The results of performance metrics already submitted
2. Process documentation and process management systems
3. Any issues that the PHMSA team should be made aware of prior to the inspection
4. Operator plans to declare "exceptional performance"

Record Keeping/ Management of Change/ Quality Assurance – the operator and PHMSA inspectors should discuss the following topics:

1. Process documentation and process management systems
2. Any issues that the PHMSA team should be made aware of prior to the inspection
3. The non-mandatory statements in the Standards

Communications Plans – the operator and PHMSA inspectors should discuss the following topics:

1. An overview of the external and internal communications plans
2. Any issues that the PHMSA team should be made aware of prior the inspection

Submittal of Program Documents – the operator and PHMSA inspectors should discuss the following topic:

1. The requirement addressed by Protocol N, that documentation must be submitted when requested.

Preventative and Mitigative Measures – the operator and PHMSA inspectors should discuss the following topics:

1. Process documentation and process management systems
2. The degree to which the operator has implemented this area of the IM program (this will help determine the amount of time the PHMSA team will need to spend in his area)

Continual Process of Evaluation and Assessment – the operator and PHMSA inspectors should discuss the following topics:

1. Process documentation and process management systems
2. The degree to which the operator has implemented this area of the IM program (this will help determine the amount of time the PHMSA team will need to spend in his area)
3. If applicable, any reassessment timeframes already scheduled